

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

FLOYD L. SEMONS,

v.

Plaintiff,

J. TAULBUT, R. FRYE,
And KAYLA, Defendant,

CASE NO. 22-CV-594

Motion TO Amend Complaint

I'm Plaintiff Floyd Semons pro se file Motion
To Amend Complaint Civil Procedure 15 Explained
and Rule 15 Federal Rule of civil Procedure as
Followings;

Amend Complaint

I. Plaintiff Respectfully Require the two Maintenance
Defendants Be Add with following support, due to
Court Error mistake Documents, and Complaint.
There were Affidavits Exhibit 004 reply on The court
enlighten.

II, Defendant Taulbut informed HISU Staff March, 30, 2022
② John Doe Maintenance staff Place "Paint over" Wet
Plaster which cause Multiple wholes in the walls as
Damage wall Cause Repeatedly Crumbling Plaster to fall
into the Living Area, Bed Area of the Cell. So HISU didn't
Charge me Co-Pay \$7.50 due to indication.

III, Defendant Taulbut already Place a work order end
Before Plaintiff Were assigned to cell 8 on unit 10 at
Dodge Correctional institution. Meaning Before March, 28
When Plaintiff was assigned, Meaning Defendant
Vicarious Liability as Both Maintenance workers
Knew were aware of Dangerous ~~to~~ Condition which
Maintenance Have a Duty to Keep the Environment safe.
The Eighth amendment is violated Even if a Plaintiff
② Face danger without Receive injuries.

Attachment Page 2 2 of 3
Motion To Amend Complaint.

IV. Defendant R. Frye is the ~~Supervisor~~
Supervisor of Maintenance the one who Receive
Officers work orders from Units at DCI.
He ~~is~~ is Liable for under Violating Plaintiff
Eighth amendment by Being aware of Incident
Before it Even took Place. C.O Taubut Place
CardBoard over the Bottom Bunk Area against the
Cell Bunk in walls due to the Top and Bottom Bunk
are connected to the walls, Also due to Taubut
were trying to Help the Crumbling Plaster from
Reaching the Bottom Bunk Bed area at a Point
Before Plaintiff was assigned to Cell 8.

V. Kayla Maintenance worker are to fix the wall or Any
Damage if reported to R. Frye, On April, 1, 2022
D. John Doe Maintenance worker I Believe it were
Defendant R. Frye Acknowledge the walls From the
Cell door. I didnt seen Kayla to Fix it until
April 1, 13, 2022. Kayla also informed witness Exhibit 04
Daishawn inmate another Maintenance worker Place
~~Paint~~ Paint over Wet Plaster in Cell 8 as He wasnt getting
assigned to that Cell 8 under Her supervisor vision.
Respectfully I dont Believe she ~~is~~ Liable under
any Eighth amendment claim. I agree with
Honorable Magistrate Judge William to dismiss
This Defendant, Require Maintenance R. Frye to
Stand Trial under Violating Plaintiff Eighth
Amendment Claim against Him.

V. Defendant Maintenance R. Frye where aware of
a injury may take Place By knowing of Crumbling
Plaster in someone that work for Him Place
Paint over Wet Plaster causing serious Damage
to the Cell walls, There for the Eighth amendment
Deliberate indifferent claim shall Be granted against
2 of 3 - R. Frye.

Attachment Page 3 3 of 3
Motion to Amend Complaint.

Damage To Walls. *Sign/Seal of Floyd*
Date 8-24-2022

VI. The Damage Require Multiple hole in the Walls. There are 4 Connected walls in each cell. The wall Towards the Rear of a cell Had Multiple holes with crumbling Plaster Reap Readily Falling on to the Bunk Area were inmates Have to sleep, which is Connected to the Bunks. The Damage that wall Had along were 9-10 holes and the walls going down the whole wall against the Top Bunk in Bottom Bunk Area, holes as 2-3 ~~each~~ inches Some Even 4-6 inches Multiple little holes like 30 or more very little holes as well Surrounding the Bigger holes with Plaster Falling.

VII. The Wall TO your Left which will Be cell 8 Left Hand side wall which Have the Bunks ~~are~~ also Connected The wholes were 2-3 inches Even By The wall Towards the Cell Door Left Hand side that's Not Connected to the Bunk Area Had Bigger wholes 4-6 inches with Multiple wholes around them wholes. You can tell By Acknowledging them, The Paint were Wet when some one Paint it on the walls due to Lines were going throw the walls in some parts That ~~Looked~~ Looked another hole in the wall were coming ~~out~~. The Plaster Fall on Plaintiff Face more then Once in feet, Connecting with Plaintiff eyes. Medical Records show Exhibit 011 Plaintiff right Eye Have 20/20 vision the injury Plaintiff right Eye Have 20/30 vision with Corneal ~~Abrasion~~ Eye Left Have 20/30 vision with Corneal ~~Abrasion~~ with days of Eye Treatment For infection medicated Prescribed For days 4-5 suffering. Serious Damage For life. Address Response Floyd Semons, #581602 GBCI TO: Clerk and P.O. Box 19033, Green Bay, WI 54307 Magistrate Judge And Defendant Atty.